

DRAFT RESPONSE:

Ex. 5 - Deliberative Process

Sincerely,
TB

ORIGINAL LETTER:

From: Stephen Zayko [<mailto:zayko@pmenv.com>]

Sent: Friday, September 1, 2017 10:37 AM

To: Bahadori, Tina <Bahadori.Tina@epa.gov>

Cc: Pruitt, Scott <Pruitt.Scott@epa.gov>

Subject: trichloroethene tox data review

Ms. Bahadori,

Does the EPA have any plans to re-evaluate toxicity information for trichloroethene (TCE) currently published in the Integrated Risk Information System (IRIS) database? The current risk/exposure information for TCE is based upon the retracted findings (see attached pdf) of a flawed 2003 drinking water study (PD Johnson, et.al. University of Arizona).

I ask because many states are basing laws, policy, rules, and regulations on information obtained from the IRIS database (see attached). The State of Michigan is now championing the idea that a single acute (<24 hours) exposure to (2ug/m3 = 20 ug total per day) TCE will cause mutagenic congenital heart defects based upon IRIS information which is based upon a drinking water study (Johnson et.al. 2003) that effectively gave rats a teaspoon (equivalent) of TCE every day of the gestational period. The proposed Part 201 rule changes (see attached) will needlessly cost Michigan businesses millions of dollars for (soon to be) required presumptive remedies to problems that do not exist and result in a decrease in state economic growth.

I hope that the current EPA leadership will bring the scientific information currently available from EPA back to a reasonable set of information and not the alarmist, chicken little, information pushed by overzealous, willfully nescient, scientists of the past.

Thank you,

Z

Stephen Zayko, P.E., C.P.G. | *Manager - Technical Services / Senior Engineer*

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